

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

Criminal No. 21-MJ-30340

v.

Tasbir Singh

Defendant(s).

**MOTION AND BRIEF FOR LEAVE TO
DISMISS COMPLAINT WITHOUT PREJUDICE**

Pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, the United States of America hereby moves for leave to dismiss without prejudice the complaint against Tasbir Singh. In this case, the government needs additional time

- 1) to develop and obtain evidence sufficient to establish defendant's guilt beyond a reasonable doubt;
- 2) to investigate the full extent of the offense(s) in question and identify all other individuals who should be held criminally responsible for the offense(s); or
- 3) to decide whether criminal prosecution of defendant for the offense(s) in question is in the public interest.

See generally United States v. Lovasco, 431 U.S. 783, 790-96 (1977); 18 U.S.C. § 3161(d)(1). The government's ability to prosecute this case properly would be substantially impaired were it required to proceed to indictment or information within the 30-day period prescribed by the Speedy Trial Act, *see* 18 U.S.C. §§

3161(b), 3161(h). Accordingly, the government requests leave to dismiss the complaint without prejudice.

Respectfully submitted,

SAIMA S. MOHSIN
Acting United States Attorney

s/David Portelli
David Portelli
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226
dave.portelli@usdoj.gov
(313) 226-9711

Dated: July 22, 2021

CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Ellen Katzman Michaels
emichaelsatty@gmail.com

s/David Portelli
David Portelli
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226
dave.portelli@usdoj.gov
(313) 226-9711